

PAUL PADDALAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888 • Fax (702) 366-1940

PAUL S. PADDALAW, ESQ.
Nevada Bar No. 10417
Email: psp@paulpaddalaw.com
PAUL PADDALAW, PLLC
4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ESTATE OF THOMAS KAIL, by and
through Sonia Kail as Special Administrator;
SONIA KAIL (an individual); JOLENE
KAIL (an individual); JON KAIL (an
individual),

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:20-cv-1262-APG-BNW

**STIPULATION TO EXTEND
DEADLINE TO AMEND PLEADINGS**

Pursuant to Local Rule of Civil Practice 7-1, the parties, by and through their respective counsel, hereby stipulate to extend the deadline for amending pleadings to and until April 14, 2023. Presently, the deadline for amendment of pleadings is March 30, 2023. This request, should it be approved by the Court, will not affect the discovery cut-off period which is currently set to expire on May 29, 2023.

In support of this Stipulation, the parties rely upon the following:

1. The Court extended the discovery period in this case to the end of May 2023 at

PAUL PADDALAW, PLLC
 4560 South Decatur Boulevard, Suite 300
 Las Vegas, Nevada 89103
 Tele: (702) 366-1888 • Fax (702) 366-1940

a hearing held on February 7, 2023. *See* ECF No. 41. Since that time, the parties have been diligently working to comply with the deadlines established at that hearing. To that end, Plaintiff's counsel deposed Defendant's medical expert Dr. Richard Friedman.

2. Following the deposition of Dr. Friedman, the parties discussed this case and agreed that a short extension of the current deadline for amending pleadings is necessary and may be beneficial in advancing settlement possibilities in this case. However, prior to potential amendment of pleadings, Plaintiffs' counsel needs time to meet with his clients and explain the benefits of amendment. The additional time requested herein will provide counsel for Plaintiffs sufficient time to accomplish the foregoing and make a decision regarding amendment.

3. Both parties are in agreement that this request for additional time is appropriate, especially in light of the fact that neither party will experience any prejudice by it and it will not affect the current discovery cut-off period of May 29, 2023.

Respectfully submitted,

/s/ Skyler Pearson

/s/ Paul S. Padda

Skyker Pearson, Esq.
 Assistant United States Attorney
 UNITED STATES ATTORNEY'S OFFICE
 333 Las Vegas Blvd. South, Suite 5000
 Las Vegas, Nevada 89101
 Tele: (702) 388-6530

Paul S. Padda, Esq.
 PAUL PADDALAW
 4560 South Decatur Blvd., #300
 Las Vegas, Nevada 89103
 Tele: (702) 366-1888

Counsel for Defendant

Counsel for Plaintiffs

Dated: March 30, 2023

Dated: March 30, 2023

IT IS SO ORDERED


 UNITED STATES MAGISTRATE JUDGE

DATED: March 31, 2023